

### **REMARKS/ARGUMENTS**

This Amendment is in response to the Office Action dated January 5, 2005. Claims 1-28 are pending in the present application. Claims 29-50 have been withdrawn from consideration. Claims 1-28 have been rejected. Claims 1, 9, 15, and 22 have been amended to further define the scope and novelty of the present invention, as well as to address the §101 and §112 rejections, in view of the Examiner's comments, to place the claims in condition for allowance. Support for the amendments to claims 1, 9, 15, and 22 is found on page 10, lines 15-20, and on page 11, lines 18-22. Applicants respectfully submit that no new matter has been presented. Claims 29-50 have been withdrawn from consideration by the Examiner as being drawn to a non-elected invention. Accordingly, claims 1-28 remain pending. For the reasons set forth more fully below, Applicant respectfully submit that the claims as presented are allowable. Consequently, reconsideration, allowance, and passage to issue are respectfully requested.

Applicants include a Petition for Extension of Time to extend the deadline for filing a response by one month from April 6, 2005 to May 5, 2005.

#### **Claim Rejections - 35 U.S.C. §101 and §112**

The Examiner has stated:

**Claims 1-7 are rejected under 35 U.S.C. 101 because the claimed invention is not supported by either a computer or a machine which would result in a practical application producing a concrete, useful, and tangible result.**

**Although the claims disclose a method of composing a query against a database, the method itself can be achieved mentally by a human without a computer or a machine; therefore, the language of the claims raises a question as to whether the claims are directed merely to an abstract idea that is not tied to a technical art, environment or machine which would result in a practical application producing a concrete, useful, and tangible result to form the basis of statutory subject matter under U.S.C. 101.**

**Claims 1-7 are also rejected under 35 U.S.C. 112, first paragraph. Specifically, since the claimed invention is not supported by either a computer or a machine asserted utility or a well established utility for the reasons set forth above, one skilled in the art clearly would not know how to use the claimed invention.**

In response, the term “computer-implemented” has been added to the preambles of claims 1 and 9 to make clear that the invention is supported by a computer, which would result in a practical application producing a concrete, useful, and tangible result.

### **Claim Rejections - 35 U.S.C. §102**

The Examiner has stated:

**Claims 1-28 are rejected under 35 U.S.C. 102(e) as being anticipated by Bailey (U.S. Pat. No. 6,658,407).**

**As per claims 1 and 9, Bailey discloses “A clause-based relational queries” by providing query objects that facilitate accessing data contained in a database (See Bailey Title and the Abstract). In particular Bailey discloses the claimed limitations of: a) “composing a selection clause for said query, said selection clause comprising a results set related to said query” by providing a query string using a select clause mechanism (See Bailey col. 6, line 46 through col. 7, line 11); b) “composing a criteria clause for said query, said criteria clause comprising input criteria related to said query and additional criteria specified against said query” by connecting the clauses with Boolean operators (See Bailey col. 7, lines 12-36); and c) “composing a source clause utilizing elements in said database identified by said query” by the From clause as the source ( See Bailey col. 8, lines 33-56). ...**

Applicants respectfully traverse the Examiner’s rejections. The present invention provides a method and system for composing a query for application against a database. In accordance with the present invention, the method includes composing a selection clause for the query. The selection clause includes a results set related to the query. The method also includes composing a criteria clause for the query. The criteria clause includes input criteria related to the query and additional criteria specified against the query. The input criteria are associated with tables and predetermined relationships among the tables are stored in a relationship dictionary.

The method also includes composing a source clause utilizing elements in the database identified by the query. Bailey does not teach or suggest these features, as discussed below.

Bailey discloses clause-based relational queries. Query objects facilitate accessing data contained in a database by allowing a user to query the database without having to know SQL or the relationships between the underlying tables in the database. These query objects are built from clauses and are related to each other by clause operators. These query operators define operations on the query objects, such as union, intersection, and interaction-complement operators. New query objects are constructed based on operand query objects and the query operators by which the operand query objects are related. (Abstract.)

However, Bailey does not teach or suggest “composing a criteria clause for said query,” wherein the “input criteria are associated with tables, and wherein predetermined relationships among the tables are stored in a relationship dictionary,” as recited in amended independent claims 1, 9, 15, and 22. The Examiner has referred to column 7, lines 12-36, of Bailey as disclosing the criteria clause composing step of the present invention, specifically referring to Boolean operators. However, the Boolean operators of Bailey are merely used by a query object to build an appropriate SQL query string (column 7, lines 32-36). The use of the Boolean operators in Bailey is different from composing the criteria clause of the present invention, because the use of the Boolean operator does not involve a relationship dictionary, “wherein predetermined relationships among the tables are stored in a relationship dictionary,” as recited amended independent claims 1, 9, 15, and 22. Because the query object builds a query string based on Boolean operators, Bailey *teaches away* from the “predetermined relationships among the tables” as recited in the present invention.

The method also includes composing a source clause utilizing elements in the database identified by the query. Bailey does not teach or suggest these features, as discussed below.

Bailey discloses clause-based relational queries. Query objects facilitate accessing data contained in a database by allowing a user to query the database without having to know SQL or the relationships between the underlying tables in the database. These query objects are built from clauses and are related to each other by clause operators. These query operators define operations on the query objects, such as union, intersection, and interaction-complement operators. New query objects are constructed based on operand query objects and the query operators by which the operand query objects are related. (Abstract.)

However, Bailey does not teach or suggest “composing a criteria clause for said query,” wherein the “input criteria are associated with tables, and wherein predetermined relationships among the tables are stored in a relationship dictionary,” as recited in amended independent claims 1, 9, 15, and 22. The Examiner has referred to column 7, lines 12-36, of Bailey as disclosing the criteria clause composing step of the present invention, specifically referring to Boolean operators. However, the Boolean operators of Bailey are merely used by a query object to build an appropriate SQL query string (column 7, lines 32-36). The use of the Boolean operators in Bailey is different from composing the criteria clause of the present invention, because the use of the Boolean operator does not involve a relationship dictionary, “wherein predetermined relationships among the tables are stored in a relationship dictionary,” as recited amended independent claims 1, 9, 15, and 22. Because the query object builds a query string based on Boolean operators, Bailey *teaches away* from the “predetermined relationships among the tables” as recited in the present invention.

Therefore, Bailey does not teach or suggest the combination of steps as recited in the present invention, and these claims are allowable over Bailey.

Dependent claims

Dependent claims 2-8, 10-14, 16-21, and 23-28 depend from amended independent claims 1, 9, 15, and 22, respectively. Accordingly, the above-articulated arguments related to amended independent claims 1, 9, 15, and 22 apply with equal force to claims 2-8, 10-14, 16-21, and 23-28, which are thus allowable over the cited reference for at least the same reasons as 1, 9, 15, and 22.

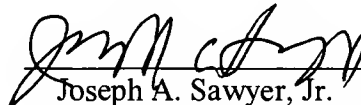
Conclusion

In view of the foregoing, Applicants submit that claims 1-28 are patentable over the cited reference. Applicants, therefore, respectfully request reconsideration and allowance of the claims as now presented.

Applicants' attorney believes that this application is in condition for allowance. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

Respectfully submitted,

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